

UNITED STATES DISTRICT COURT
FOR DISTRICT OF MASSACHUSETTS

LORI UCCI; and
RONALD UCCCI

Vs.

WILLIAM FORD; and
KIMBERLY PERRY

:
:
:
:
:
:
:

C.A. No.: 05CV10997PBS

PLAINTIFFS' INITIAL DISCLOSURE
PURSUANT TO RULE 26

Plaintiffs hereby provide the within initial disclosure pursuant to Federal Rule 26(a)(1) and in accord with the Joint Discovery Plan entered in this matter.

A. INDIVIDUALS WITH DISCOVERABLE INFORMATION

1. Lori Ucci – 92 Eden Crest Drive, Cranston, RI 02920, (401) 946-3408, driver of the vehicle struck from behind by William Ford, personal injuries, lost wages, pain/suffering and general damages;
2. Ronald Ucci - 92 Eden Crest Drive, Cranston, RI 02920, (401) 946-3408, husband of Lori Ucci, extent of loss of consortium damages;
3. William Ford – 89 Chestnut Street, Seekonk, MA 02771, unknown telephone number, driver of the vehicle that struck Mrs. Ucci's vehicle;
4. Kimberly Perry – 95 Chestnut Street, Seekonk, MA 02771, unknown telephone number, owner of the vehicle that struck Mrs. Ucci's vehicle;
5. Brenda Davis – RR5 Box 6292, Gardiner, ME 04354, unknown telephone number, driver of the vehicle that stopped in front of Mrs. Ucci's vehicle;
6. Massachusetts State Trooper MJ Igielski #2539 out of Framingham H-2;
7. Mrs. Ucci's medical providers and employer as follows:

Violeta M. Manansala, M.D.
Garden City Treatment Center
1150 Reservoir Avenue
Cranston, RI 0920
(401) 946-2400

Syed M. Sayeed, M.D.
400 Warren Avenue
East Providence, RI 02914
(401) 431-1800

Keeper of Records
Rhode Island Hospital
593 Eddy Street
Providence, RI 02903
(401) 444-4000

Keeper of Records
Med-Tech Ambulance/A-Stat
41 Mendon Avenue
Pawtucket, RI 02861
(401) 723-5533

Attn: Employment Records/Human Services
CVS Pharmacy
One CVS Drive
Woonsocket, RI 02895

B. DOCUMENTS AND TANGIBLE THINGS

1. Commonwealth of Massachusetts Motor Vehicle Crash Police Report compiled by the Massachusetts State Police on 7/24/02;
2. Progressive Insurance Company – Subrogation Unit – property damage payments in the amount of \$2,951.27, \$13,198.73 and \$280.00;
3. black and white copies of ten (10) photographs of the damage to Mrs. Ucci's vehicle;
4. Progressive Insurance Company damage estimate for Mrs. Ucci's vehicle;
5. CCC Information Services, Inc. Valuation statement dated 7/25/02;
6. NADA value July 2002;

7. ADESA Impact towing and storage bill;
8. certificate of title;
9. CVS earnings statements (2);
10. Enterprise Rent A Car receipt for car rental;
11. Medical Records as follows:

Violeta M. Manansala, M.D.
Garden City Treatment Center
1150 Reservoir Avenue
Cranston, RI 0920
DOS: 7/25/02
Total: \$462.46

Syed M. Sayeed, M.D.
400 Warren Avenue
East Providence, RI 02914
(401) 431-1800
Total: \$6,620.00

Keeper of Records
Rhode Island Hospital
593 Eddy Street
Providence, RI 02903
(401) 444-4000
Total: \$1,303.00

Keeper of Records
Med-Tech Ambulance/A-Stat
41 Mendon Avenue
Pawtucket, RI 02861
DOS: 7/25/02
Total: Unk. at this time

CVS/Pharmacy
1188 Pontiac Avenue
Cranston, RI 02920
DOS: 10/11/02
Total: \$16.39

C. DAMAGES

Plaintiffs rely on the medical records and bills submitted herewith, which are summarized as follows:

Garden City Treatment Center:	\$462.46
Rhode Island Hospital:	\$1,303.00
Syed M. Sayeed, M.D.	\$6,620.00
CVS	\$16.39
	<hr/>
	\$8,365.85

Dr. Sayeed concluded that Mrs. Ucci was totally disabled from her usual work from July 25, 2002 until December 9, 2002, and partially disabled from December 10, 2002 through January 20, 2003. The demands of Mrs. Ucci's employment and the requirements of her employer (CVS/Pharmacy), she was able to return on March 31, 2003, without limitations.

At the time of the accident, Mrs. Ucci net weekly wage as a pharmacist was \$943.01 (post taxes). The total of her lost net wages, including the period of her full disability and her partial disability is **\$33,415.29**

D. INSURANCE

There is no counterclaim for monetary damages against the Plaintiffs.

Plaintiffs
By their attorneys,

/S
Scott Tierney RI
James W. Bagnell MA BBO 026160
179 Webster Street
East Boston, MA 02128-2835
(617) 943-3129
(617) 567-1055 (fax)

CERTIFICATION

I hereby certify that a true copy of the within document and enclosures was sent on this 28th day of October, 2005 to the following:

Mark A. Darling, Esq.
Luanan DiSarra, Esq.
Litchfield Cavo, LLP
6 Kimball Lane, Suite 100
Lynnfield, MA 01940

s/ James W. Bagnell